

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, et al.,¹

Debtors.

PROMESA
Title III

No. 17-BK-3283 (LTS)

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY
("HTA"),²

Debtor.

PROMESA
Title III

No. 17-BK-3567 (LTS)

(Joint Administration Requested)

**MOTION FOR ADMISSION
PRO HAC VICE OF MICHAEL LUSKIN**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); and (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474).

² The last four (4) digits of HTA's federal tax identification number are 3808.

COMES NOW, Michael Luskin, applicant herein and respectfully states:

1. Applicant is an attorney and a member of the law firm of Luskin, Stern & Eisler LLP, with offices at:

| | |
|---------------|---------------------|
| Address | Eleven Times Square |
| | New York, NY 10036 |
| Email | luskin@lsellp.com |
| Telephone No. | (212) 597-8220 |
| Fax No. | (212) 974-3205 |

2. Applicant will sign all pleadings with the name Michael Luskin.

3. Applicant has been retained personally or as a member of the above-named firm by the Financial Oversight and Management Board for Puerto Rico to provide legal representation in connection with the above-styled matter now pending before the United States District Court for the District of Puerto Rico.

4. Since April 1978, applicant has been and presently is a member in good standing of the bar of the highest court of the State of New York, where applicant regularly practices law. Applicant's bar license number is 1103415.

5. Applicant has been admitted to practice before the following courts:

| | |
|--|------------------------|
| <u>Court:</u> | <u>Admission Date:</u> |
| NY Court of Appeals and all NY State Courts | April 1978 |
| U.S. District Court, Southern District of NY | April 1978 |
| U.S. District Court, Eastern District of NY | April 1978 |
| Court of Appeals for the First Circuit | December 2016 |
| Court of Appeals for the Second Circuit | August 1983 |

6. Applicant is a member in good standing of the bars of the courts listed in paragraph 5.

7. Applicant is not currently suspended from the practice of law before any court or jurisdiction.

8. Applicant is not currently the subject of any complaint for unethical conduct,

disciplinary proceeding or criminal charges before any court or jurisdiction.

9. During the past three years, applicant has filed *pro hac vice* admission in the United States District Court for the District of Puerto Rico, in the following matters:

| <u>Date of Application:</u> | <u>Case:</u> |
|-----------------------------|--|
| October 7, 2016 | <u>Brigade Leveraged Capital Structures Fund Ltd., et al. v. Alejandro Garcia-Padilla, et al., Civil No. 16-1610 (FAB)</u> |
| October 13, 2016 | <u>National Public Finance Guarantee Corporation, v. Alejandro Garcia-Padilla, et al., Civil No. 16-2101 (FAB)</u> |
| October 13, 2016 | <u>Dionisio Trigo-Gonzalez, et al. v. Alejandro Garcia-Padilla, et al., Civil No. 16-2257 (FAB)</u> |
| October 13, 2016 | <u>U.S. Bank Trust National Association, v. Commonwealth of Puerto Rico, et al., Civil No. 16-2510 (FAB)</u> |
| October 28, 2016 | <u>Lex Claims, LLC, et al., v. Alejandro Garcia-Padilla, et al., Civil No. 16-2374 (FAB)</u> |
| October 28, 2016 | <u>Altair Global Credit Opportunities Fund (A), LLC, v. Alejandro Garcia-Padilla, et al., Civil No. 16-2696</u> |
| October 28, 2016 | <u>Peaje Investments, LLC, v. Alejandro Garcia-Padilla, et al., Civil No. 16-2365</u> |
| October 28, 2016 | <u>Assured Guaranty Corp., et al., v. Commonwealth of Puerto Rico, et al., Civil No. 16-2384</u> |

10. Local counsel of record associated with applicant in this matter is:

| | |
|-----------------|---|
| Name: | Hermann D. Bauer |
| USDC-PR Bar No: | 215205 |
| Law Firm: | O'Neill & Borges LLC |
| E-mail: | hermann.bauer@oneillborges.com |
| Address: | 250 Muñoz Rivera Avenue, Suite 800 San Juan, PR 00918-1813 |
| Telephone: | (787) 764-8181 |
| Fax: | (787) 753-8944 |

11. Applicant has read the local rules of this court and will comply with same.

12. Applicant has read Local Rules of the United States District Court for the District of Puerto Rico which provide in part that attorneys appearing *pro hac vice* must comply with the provisions set forth therein and pay an admission fee of \$300.00 per appearance in each new case

before the Court. Accordingly, payment of the *pro hac vice* admission fee is attached hereto in the form of a check or money order payable to: "Clerk, U.S. District Court."

WHEREFORE, applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico for the above-styled case only.

In New York, New York, this 27th day of June, 2017.

Michael Luskin

Printed Name of Applicant



Signature of Applicant

I HEREBY CERTIFY, pursuant to Local Rule 83A(f), that I consent to the designation of local counsel of record for all purposes.

In San Juan, Puerto Rico, this 28th day of June, 2017.

Hermann D. Bauer
Printed Name of Local Counsel

/s/ Hermann D. Bauer
Signature of Local Counsel

I HEREBY CERTIFY that on this same date the foregoing motion was filed with the Clerk of the Court using the CM/ECF system of the US Bankruptcy Court for the District of Puerto Rico for Case No. 17 BK 3283, which will send notification of such filing to all attorneys of record, and the original was served upon the Clerk of Court on June 28, 2017, accompanied by a \$300.00 *pro hac vice* admission fee.

Respectfully submitted, in San Juan, Puerto Rico, this 28th of June, 2017.

/s/ Hermann D. Bauer

Hermann D. Bauer

USDC No. 215205

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